

# **EXHIBIT A**

**Leslee Schwartz, Esq. (ID: 092692021)**  
**STEVEN P. HADDAD, P.C.**  
100 W. Pond Road  
Hopelawn, NJ 08861  
732-933-3535 Fax: 732-933-3536  
Attorney for Plaintiff, Mervat Grgis

<p><b>MERVAT GIRGIS,</b> Plaintiff  Vs.  <b>COSTCO WHOLESALE CORP., and/or JOHN DOES 1-10 (being fictitious persons unknown at this time) and/or ABC CO. 1-10 (being fictitious business entities whose identities are unknown at this time), RD MANAGEMENT LLC., and/or JANE DOES 1-10 (being fictitious persons unknown at this time) and/or DEF CO. 1-10 (being fictitious business entities whose identities are unknown at this time),</b>  Defendants</p>	<p>SUPERIOR COURT OF NEW JERSEY HUDSON COUNTY - LAW DIVISION DOCKET NUMBER: HUD-L-  <b>CIVIL ACTION</b> <b>COMPLAINT AND JURY DEMAND</b></p>
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Plaintiff, **MERVAT GIRGIS**, residing at 183 Liberty Avenue, in the City of Jersey City, County of Hudson, and State of New Jersey, by way of Complaint says:

**FIRST COUNT**

1. On or about July 7, 2020, Plaintiff, **MERVAT GIRGIS**, was lawfully on the premises of Costco Wholesale Corporation located at 21 Goldsborough Drive in the City of Bayonne, County of Hudson and State of New Jersey.
2. At the time and place aforesaid, the property was owned by **RD MANAGEMENT LLC., and/or JANE DOES 1-10 (being fictitious persons unknown at this time) and/or DEF CO. 1-10 (being fictitious business entities whose identities are unknown at this time)**.

3. At the time and place aforesaid, Defendants, **COSTCO WHOLESALE CORP.**, and/or **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), managed and maintained said premises owned by Defendant, **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time).

4. At the time and place aforesaid, Defendants, **COSTCO WHOLESALE CORP.**, and/or **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time), owned, operated, maintained and/or controlled the premises in a negligent, careless and reckless manner creating foreseeable and dangerous conditions and activities on the premises, causing Plaintiff, **MERVAT GIRGIS**, to slip, fall and injure herself.

5. At the time and place aforesaid, Defendants, **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), were acting within the scope of servitude, agency and/or employment for Defendant, **COSTCO WHOLESALE CORP.**

6. At the time and place aforesaid, Defendants, **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time), were acting within the scope of servitude, agency and/or employment for Defendant, **RD MANAGEMENT LLC.**

7. As a direct and proximate result of the negligence of Defendants, **COSTCO WHOLESALE CORP.**, and/or **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time), Plaintiff, **MERVAT GIRGIS**, was injured, has incurred and in the future will incur expenses for her treatment of injuries, has been disabled and in the future will be disabled and not be able to perform her usual functions, and has been and in the future will be caused great pain and suffering, to her great loss and damage and has lost time from her usual occupation.

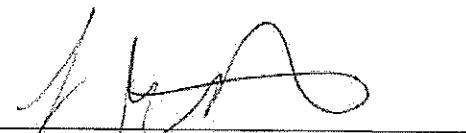
**WHEREFORE**, Plaintiff, **MERVAT GIRGIS**, demands judgment against Defendants for damages, together with interest, attorney's fees, costs of suit, and any other relief the Court deems just.

**CERTIFICATION**

I hereby certify that this matter is not subject of any other action pending in any court or arbitration proceeding, that no such other action or arbitration proceeding is contemplated by this plaintiff, and that there are no other parties, whom, to the knowledge of the plaintiffs' counsel, should be joined in this action.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: June 28, 2022



**LESLEE SCHWARTZ, ESQ.**  
**For the Law Offices of Steven P. Haddad**  
**Attorney for Plaintiff, Mervat Grgis**

**DEMAND FOR ANSWERS TO INTERROGATORIES**

The Plaintiff demands that each defendant supply answers to Uniform Interrogatories, Form C and C(2), within the time frame allowed by the Rules of Court.

**DEMAND FOR ANSWERS TO NOTICE TO PRODUCE DOCUMENTS**

The Plaintiff demands that each defendant provide documents pursuant to the following Notice to Produce Documents within the time frame provided by the Rules of Court.

1. Please produce all policies of insurance, including, but not limited to, primary policies, excess policies, umbrella policies, or any other policy that is available for coverage and payment of the Plaintiff's claim.
2. Please produce all statements made by any party to this matter.
3. Please produce all statements made by any witness to the alleged accident.
4. Please produce all background searches, C.I.B. searches, or any other search regarding past personal injury claims, or personal injury lawsuits, of any nature, made by the Plaintiff.
5. Please produce all reports regarding the accident or incident referred to in this Complaint.
6. Please produce any records of any medical treatment for the Plaintiff in this matter.
7. Please produce all photographs, videotapes, and/ or audiotapes obtained regarding the Plaintiff, the Plaintiff's vehicle, or the defendant(s) vehicle in this matter.
8. Please produce all property damage estimates for all vehicles involved in this accident.
9. Please produce any photographs of the accident scene in this matter.

**DEMAND FOR DISCOVERY OF INSURANCE COVERAGE**

Pursuant to R. 4:10-2, demand is hereby made that you disclose to the undersigned whether there are any insurance policies or agreements under which a person or firm carrying an insurance business may be liable to satisfy all or part of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. Yes (  ) No (  )

If the answer is yes, attach a copy of each policy, or in the alternative, state under oath or certification the following: (a) policy number; (b) name and address of the insurer or issuer; (c) inception and expiration date; (d) names and addresses of all persons insured under the policy; (e) personal injury limits; (f) property damage limits; (g) medical payment limits; (h) name and address of person who has custody and possession thereof; (i) where and when policy can be inspected.

**JURY DEMAND**

Plaintiff hereby demands a trial by jury as to all issues so triable.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to R. 4:5-1(c), Stephen A. Mennella, Esq. is designated as trial counsel.

**NOTICE PURSUANT TO R.1:7-1**

Pursuant to R.1:7-1(b), Plaintiff hereby gives notice of his/her intention to suggest to the trier of fact that unliquidated damages be calculated on a time-unit basis without reference to a specific sum.

# **EXHIBIT B**

THE HADDAD LAW FIRM, PC  
LESLIE SCHWARTZ, ESQ.  
100 W. Pond Rd,  
Hopelawn, NJ 08861  
(732) 933-3535  
NA

RECEIVED  
AUG 02 REC'D  
G.L. CLAIMS DEPT.

ATTORNEY FOR THE PLAINTIFF

MERVAT GIRGIS

Plaintiff

-v-

COSTCO WHOLESALE CORP., ET AL

Defendant(s)

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION  
Hudson COUNTY  
DOCKET NO.: HUD-L-002118-22

CIVIL ACTION

SUMMONS

FROM THE STATE OF NEW JERSEY TO: COSTCO WHOLESALE CORP.

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey, and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages, or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).

/s/ Michelle M. Smith  
Michelle M. Smith,  
Clerk of the Superior Court

DATED: July 22, 2022

Name of the Defendant(s) to be served: COSTCO WHOLESALE CORP.

Address of the Defendant(s) to be served: 999 LAKE DRIVE, ISSAQAH, WA 98027

hand served  
8/1/2022  
JAY CHINDAVAT

<b>ATLANTIC COUNTY</b> Law Division, Direct Filing Atlantic County Court House 1201 Bacharach Blvd., 1st Floor Atlantic City, NJ 08401 <b>LAWYER REFERRAL:</b> 609-345-3444 <b>LEGAL SERVICES:</b> 609-348-4200	<b>GLoucester COUNTY</b> Civil Case Management Office Att: Intake Court House - 1st Floor One North Broad Street Woodbury, NJ 08096 <b>LAWYER REFERRAL:</b> (856) 848-4589 <b>LEGAL SERVICES</b> (856) 848-5360	<b>OCEAN COUNTY</b> Law Division, Direct Filing Court House - Room 119 118 Washington Street Toms River, NJ 08754 <b>LAWYER REFERRAL:</b> 732-240-3666 <b>LEGAL SERVICES</b> 732-341-2727
<b>BERGEN COUNTY</b> Law Division, Civil Case Processing 119 Justice Center 10 Main Street Hackensack, NJ 07601-7698 <b>LAWYER REFERRAL:</b> 201-488-0044 <b>LEGAL SERVICES:</b> 201-487-2166	<b>HUDSON COUNTY</b> Superior Court Civil Records Dept. Breanen Court House - 1st Floor 583 Newark Avenue Jersey City, NJ 07306 <b>LAWYER REFERRAL:</b> 201-798-2727 <b>LEGAL SERVICES</b> 201-792-6363	<b>PASSAIC COUNTY</b> Passaic County Civil Div. Office Court House 77 Hamilton Street Paterson, NJ 07505 <b>LAWYER REFERRAL:</b> 973-278-9223 <b>LEGAL SERVICES</b> 973-523-2900
<b>BURLINGTON COUNTY</b> Superior Court, Law Division Courts Facility - 1st Floor Box 6555 Mt. Holly, NJ 08060 <b>LAWYER REFERRAL:</b> 609-261-4862 <b>LEGAL SERVICES:</b> 609-261-1088	<b>HUNTERDON COUNTY</b> Civil Division Office Hall of Records 71 Main Street Flemington, NJ 08822 <b>LAWYER REFERRAL:</b> 908-735-6112 <b>LEGAL SERVICES</b> 908-782-7979	<b>SALEM COUNTY</b> Law Division, Direct Filing Court House 92 Market Street P.O. Box 18 Salem, NJ 08079 <b>LAWYER REFERRAL:</b> 856-935-4629 <b>LEGAL SERVICES</b> 856-451-0003
<b>CAMDEN COUNTY</b> Civil Processing Office Hall of Justices - 1st Floor 501 Fifth Street Camden, NJ 08103 <b>LAWYER REFERRAL:</b> 856-964-4520 <b>LEGAL SERVICES:</b> 856-964-2010	<b>MERCER COUNTY</b> Mercer County Office of Deputy Clerk P.O. Box 8068 209 So. Broad Street Trenton, NJ 08650 <b>LAWYER REFERRAL:</b> 609-585-6200 <b>LEGAL SERVICES</b> 609-695-6249	<b>SOMERSET COUNTY</b> Civil Division Office Court House - 3rd Floor P.O. Box 3000 Somerville, NJ 08876 <b>LAWYER REFERRAL:</b> 908-685-2323 <b>LEGAL SERVICES</b> 908-231-0840
<b>CAPE MAY COUNTY</b> Law Division, Direct Filing Cape May Superior Court 4 Moore Road, DN203 Cape May Court House, NJ 08210 <b>LAWYER REFERRAL:</b> 609-465-0313 <b>LEGAL SERVICES:</b> 609-465-3001	<b>MIDDLESEX COUNTY</b> Superior Court - Att: Law Division Administration Bldg., 3rd Floor P.O. Box 2633 New Brunswick, NJ 08903-2633 <b>LAWYER REFERRAL:</b> 732-828-0053 <b>LEGAL SERVICES</b> 732-249-7600	<b>SUSSEX COUNTY</b> Sussex County Civil Division Sussex County Judicial Center 43-47 High Street Newton, NJ 07860 <b>LAWYER REFERRAL:</b> 973-267-5882 <b>LEGAL SERVICES</b> 973-383-7400
<b>CUMBERLAND COUNTY</b> Civil Case Management Office Court House - Room 301 Broad & Fayette Streets Box 866 Bridgeport, NJ 08302 <b>LAWYER REFERRAL:</b> 856-692-6207 <b>LEGAL SERVICES:</b> 852-451-0003	<b>MONMOUTH COUNTY</b> Law Division, Direct Filing Court House 71 Monmouth Park - West Wing P.O. Box 1252 Freehold, NJ 07728-1252 <b>LAWYER REFERRAL:</b> 732-431-5544 <b>LEGAL SERVICES</b> 732-502-0059	<b>UNION COUNTY</b> Deputy Clerk, Superior Court Court House - Room 107 2 Broad Street Elizabeth, NJ 07207-6703 <b>LAWYER REFERRAL:</b> 908-353-4715 <b>LEGAL SERVICES</b> 908-354-4340
<b>ESSEX COUNTY</b> Law Division, Direct Filing Essex County Hall of Records Room 237 Newark, NJ 07102 <b>LAWYER REFERRAL:</b> 973-622-6207 <b>LEGAL SERVICES:</b> 973-622-0063	<b>MORRIS COUNTY</b> Morris County Civil Division Court House - Box 910 Montville, NJ 07960 <b>LAWYER REFERRAL:</b> 973-267-5882 <b>LEGAL SERVICES</b> 973-285-6911	<b>WARREN COUNTY</b> Warren County Civil Div. Office Court House 413 Second Street Belvidere, NJ 07823-1500 <b>LAWYER REFERRAL:</b> 908-267-5882 <b>LEGAL SERVICES</b> 908-475-2010

Leslee Schwartz, Esq. (ID: 092692021)  
The Haddad Law Firm, P.C.  
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Hopelawn, NJ 08861  
732-933-3535 Fax: 732-933-3536  
Attorney for Plaintiff, Mervat Girgis

<p><b>MERVAT GIRGIS;</b> Plaintiff  Vs.  <b>COSTCO WHOLESALE CORP., JOHN/JANE DOE, MANAGER OF COSTCO ON 7/7/2020, and/or JOHN DOES 1-10</b> (being fictitious persons unknown at this time) and/or <b>ABC CO. 1-10</b> (being fictitious business entities whose identities are unknown at this time), <b>RD MANAGEMENT LLC.</b>, and/or <b>JANE DOES 1-10</b> (being fictitious persons unknown at this time) and/or <b>DEF CO. 1-10</b> (being fictitious business entities whose identities are unknown at this time),  Defendants</p>	<p><b>SUPERIOR COURT OF NEW JERSEY HUDSON COUNTY - LAW DIVISION DOCKET NUMBER: HUD-L-002118-22</b>  <b>CIVIL ACTION</b>  <b>FIRST AMENDED COMPLAINT AND JURY DEMAND</b></p>
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Plaintiff, **MERVAT GIRGIS**, residing at 183 Liberty Avenue, in the City of Jersey City, County of Hudson, and State of New Jersey, by way of Complaint says:

**FIRST COUNT**

1. On or about July 7, 2020, Plaintiff, **MERVAT GIRGIS**, was lawfully on the premises of Costco Wholesale Corporation located at 21 Goldsborough Drive in the City of Bayonne, County of Hudson and State of New Jersey.
2. At the time and place aforesaid, the property was owned by **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time).
3. At the time and place aforesaid, the manager of the day was Defendant, **JOHN/JANE DOE, MANAGER OF COSTCO ON 7/7/2020**.

4. At the time and place aforesaid, Defendants, **COSTCO WHOLESALE CORP.**, and/or **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), managed and maintained said premises owned by Defendant, **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time).

4. At the time and place aforesaid, Defendants, **COSTCO WHOLESALE CORP.**, and/or **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time), owned, operated, maintained and/or controlled the premises in a negligent, careless and reckless manner creating foreseeable and dangerous conditions and activities on the premises, causing Plaintiff, **MERVAT GIRGIS**, to slip, fall and injure herself.

5. At the time and place aforesaid, Defendants, **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), were acting within the scope of servitude, agency and/or employment for Defendant, **COSTCO WHOLESALE CORP.**.

6. At the time and place aforesaid, Defendants, **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time), were acting within the scope of servitude, agency and/or employment for Defendant, **RD MANAGEMENT LLC.**.

7. As a direct and proximate result of the negligence of Defendants, **COSTCO WHOLESALE CORP.**, and/or **JOHN DOES 1-10** (being fictitious persons unknown at this time) and/or **ABC CO. 1-10** (being fictitious business entities whose identities are unknown at this time), **RD MANAGEMENT LLC.**, and/or **JANE DOES 1-10** (being fictitious persons unknown at this time) and/or **DEF CO. 1-10** (being fictitious business entities whose identities are unknown at this time) and **JOHN/JANE DOE, MANAGER OF COSTCO ON 7/7/2020**, Plaintiff, **MERVAT GIRGIS**, was injured, has incurred and in the future will incur expenses for her treatment of injuries, has been disabled and in the future will be disabled and not be able to perform her usual functions, and has been and in the future will be caused great pain and suffering, to her great loss and damage and has lost time from her usual occupation.

**WHEREFORE**, Plaintiff, **MERVAT GIRGIS**, demands judgment against Defendants for damages, together with interest, attorney's fees, costs of suit, and any other relief the Court deems just.

**DEMAND FOR ANSWERS TO INTERROGATORIES**

The Plaintiff demands that each defendant supply answers to Uniform Interrogatories, Form C and C(2), within the time frame allowed by the Rules of Court.

**DEMAND FOR ANSWERS TO NOTICE TO PRODUCE DOCUMENTS**

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4. Please produce all background searches, C.I.B. searches, or any other search regarding past personal injury claims, or personal injury lawsuits, of any nature, made by the Plaintiff.

5. Please produce all reports regarding the accident or incident referred to in this Complaint.
6. Please produce any records of any medical treatment for the Plaintiff in this matter.
7. Please produce all photographs, videotapes, and/ or audiotapes obtained regarding the Plaintiff, the Plaintiff's vehicle, or the defendant(s) vehicle in this matter.
8. Please produce all property damage estimates for all vehicles involved in this accident.
9. Please produce any photographs of the accident scene in this matter.

**DEMAND FOR DISCOVERY OF INSURANCE COVERAGE**

Pursuant to R. 4:10-2, demand is hereby made that you disclose to the undersigned whether there are any insurance policies or agreements under which a person or firm carrying an insurance business may be liable to satisfy all or part of a judgment which may be entered in this action or to indemnify or reimburse for payments made to satisfy the judgment. Yes ( ) No ( )

If the answer is yes, attach a copy of each policy, or in the alternative, state under oath or certification the following: (a) policy number; (b) name and address of the insurer or issuer; (c) inception and expiration date; (d) names and addresses of all persons insured under the policy; (e) personal injury limits; (f) property damage limits; (g) medical payment limits; (h) name and address of person who has custody and possession thereof; (i) where and when policy can be inspected.

**JURY DEMAND**

Plaintiff hereby demands a trial by jury as to all issues so triable.

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to R. 4:5-1(c), Stephen P. Haddad, Esq. is designated as trial counsel.

**NOTICE PURSUANT TO R.1:7-1**

Pursuant to R.1:7-1(b), Plaintiff hereby gives notice of his/her intention to suggest to the trier of fact that unliquidated damages be calculated on a time-unit basis without reference to a specific sum.

**CERTIFICATION**

I hereby certify that this matter is not subject of any other action pending in any court or arbitration proceeding, that no such other action or arbitration proceeding is contemplated by this plaintiff, and that there are no other parties, whom, to the knowledge of the plaintiffs' counsel, should be joined in this action.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: July 14, 2022

Leslee Schwartz  
**LEESLEE SCHWARTZ, ESQ.**  
**The Haddad Law Firm, P.C.**  
Attorney for Plaintiff, Mervat Girgis

# **EXHIBIT C**



## CONTACT

### Corporate Headquarters:

RD Management LLC  
810 Seventh Avenue  
10th Floor  
New York, NY 10019  
Tel: 212.265.6600  
Fax: 212.459.9133  
Email: [info@rdmanagement.com](mailto:info@rdmanagement.com)



We look forward to  
hearing from you.